

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT
OF PENNSYLVANIA**

**NAPUA FROMAN,
Plaintiff,**

No. 05-187 Erie

v.

**TRU-WELD GRATING, INC.,
Defendant.**

**Before: Hon. Sean J. McLaughlin
U.S. District Judge**

Electronically Filed

**PLAINTIFF'S FIRST MOTION TO EXTEND DISCOVERY PERIOD
(CONSENTED TO)**

AND NOW comes Plaintiff Napua Froman, by and through her attorney Daniel J. Iler, to file this Plaintiff's First Motion to Extend Discovery Period (Consented To) and in support thereof avers as follows:

1. The discovery period as set forth in the original Case Management Order was to expire on January 31, 2006.
2. The parties find that they have been pressed for time. The Plaintiff is working and therefore has a limited availability for depositions. The attorneys have engaged in settlement discussions as well, and are hopeful that a resolution of the case can be obtained. Because of these two factors in particular, and generally because of the holidays and general scheduling difficulties the parties have found that they have been unable to meet this deadline.
3. The parties have agreed to extend the discovery period for a period of sixty days in order that they may complete discovery, with your Honor's approval. The parties

are reasonably certain that they will be able to complete discovery within the time set forth.

4. The attached proposed order includes pro rata amended dates for the other events listed in the original Case Management Order as well.

WHEREFORE, it is respectfully moved that the Plaintiff's First Motion to Extend Discovery Period (Consented To) be granted.

/s/ Daniel J. Iler
Daniel J. Iler
Attorney for Plaintiff

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